

# **EXHIBIT 1**

Declaration of Ariane Young

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

COAST TO COAST TITLE, LLC, SOL §  
SOL CITY TITLE, LLC, MAGNOLIA §  
TITLE ARKANSAS, LTD., MAGNOLIA §  
TITLE FLORIDA, LLC, THE PEABODY, §  
BULLDOG LLC, AND JOHN MAGNESS §

*Plaintiffs* §

v. §

CIVIL ACTION NO.:4:24-cv-2767

TYRELL L. GARTH, PHILLIP H. §  
CLAYTON, DEBBIE MERRITT A/K/A §  
DEBORAH MERRITT, MATTHEW D. §  
HILL, CHARLES BURNS, P. GARRETT §  
CLAYTON, SCOTT M. REEVES, §  
ARIANE E. YOUNG, §  
TINGLEMERRITT, LLP, §  
STARREX TITLE FLORIDA, LLC, §  
LAURIE COOPER, MARKETSTREET §  
CAPITAL PARTNERS, LLC, §  
MARKETSTREET CAPITAL §  
PARTNERS AR, LLC AND §  
BRIAN A. BREWER §

*Defendants.* §

**Declaration of Ariane Young**

1. My name is Ariane Young. My birthdate is February 16, 1967. I live and work in Alberta, Canada and my office address is 1250, 639 – 5 Avenue SW, Calgary, Alberta, Canada, T2P 0M9. I have personal knowledge of the facts stated in this declaration.

2. I am a citizen and resident of Canada and a partner in TingleMerrett LLP (the “Firm”), which has its sole office in Calgary, Alberta, Canada. I am not a citizen or resident of the United States.
3. I am licensed to practice law in Canada. I have never been licensed to practice law in any state of the United States. Clients engage me to advise on Canadian law, not U.S. law.
4. Starrex International Ltd. (“Starrex Ltd.”) is a Canadian company and client of the Firm. Starrex Ltd. hired TingleMerrett to advise on Canadian law aspects of certain cross-border transactions involving Plaintiffs. I did not solicit Starrex Ltd. or any of its related entities to become a client of the firm. The emails, phone calls, and other work Plaintiffs allege I performed were all done on behalf of Starrex Ltd. in my capacity as a partner of TingleMerrett, not on behalf of myself individually. I was not the primary lawyer advising Starrex Ltd., and the limited work I performed for Starrex Ltd. was done at the direction of Scott Reeves, another partner in TingleMerrett.
5. Any legal work I performed for Starrex Ltd. was performed in Canada. I have never performed any legal work for Starrex Ltd. or for any client related to this lawsuit while in the United States.
6. I do not own real or personal property in Texas. I do not pay taxes in Texas. I do not have a home, office, address, agent, employee, or telephone number in Texas. I have never worked in Texas. I do not have a bank account in Texas.
7. I have never traveled to Texas for any purpose related to Starrex Ltd. or the Firm. I have been to Texas one time for a concert and have on occasion passed through airports in Texas on my way to other places. Other than those trips, I have not traveled to Texas.

I swear under penalty of perjury under the laws of the United States and Canada that the foregoing is true and correct.

SIGNED on November 14, 2024, in Calgary, Alberta, Canada.

*Ariane Young*

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Ariane Young



# Signature Certificate

Reference number: JWCJV-RRYGK-5LVKC-RPNTI

## Signer

## Timestamp

## Signature

### Ariane Young

Email: ayoung@tinglemerrett.com

Sent:

14 Nov 2024 16:50:07 UTC

Viewed:

14 Nov 2024 16:53:40 UTC

Signed:

14 Nov 2024 17:17:26 UTC



### Recipient Verification:

✓ Email verified

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Location: Calgary, Canada

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14 Nov 2024 17:17:26 UTC

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